UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX

IN THE MATTER OF: Robert L. Helms Construction & Development Company Respondent:	Order No. 93-17 ADMINISTRATIVE ORDER PURSUANT TO SECTION 106(a) OF THE COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT OF 1980 as amended, 42 U.S.C. Section 9606(a)

I. PREAMBLE

A. This Administrative Order ("Order") is issued on this date to the Robert L. Helms Construction & Development Company ("Respondent"), pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9606(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 ("CERCLA"), delegated to the Administrator of the United States Environmental Protection Agency ("U.S. EPA") by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, further delegated to the EPA Regional Administrators by U.S. EPA Delegation Nos. 14-14-A and 14-14-B, and further redelegated to the Director, Hazardous Waste Management Division by Region IX Delegations 1290.41 and 1290.42.

B. The State of Nevada has been notified of the issuance of this Order as required by Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a).

C. This Order requires the Respondent to undertake and complete removal activities to abate an imminent and substantial endangerment to the public health and welfare or the environment that may be presented by the actual or threatened release of hazardous substances.

II. FINDINGS OF FACT

A. Based on available information, including the Administrative Record in this matter, U.S. EPA hereby finds:

B. Site Description

1. The Sparks Solvent/Fuel Site (the "Site") is located in southern Sparks, Nevada, in the Truckee River Groundwater Basin, approximately one mile from the Truckee River. The Site includes the Southern Pacific Rail Yard ("SPRY"), the Santa Fe Pacific Pipeline Limited Partnership Reno Terminal Tank Farm ("SFP" or "tank farm"), and all areas of surface and subsurface contamination.

2. The SPRY has been operating at this Site since the turn of the century. SPRY's current and past operations include maintenance, cleaning, refueling, and storage of railroad engines and other rolling stock.

3. The tank farm has been in operation since the late 1950s. The tank farm is served by petroleum pipelines originating in the San Francisco Bay Area. It also delivers petroleum products through a pipeline which terminates at the Fallon Naval Air Station. SFP's current and past operations include storage and loading facilities for diesel fuel, gasoline, jet fuels, heating oils and gasoline additives.

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C. Respondents

1. To date eleven respondents have been identified with this Site. The Respondents at the Site are Robert L. Helms Construction & Development Company and the following entities which were the subject to U.S. EPA Order No. 91-22 issued on August 22, 1991:

a. Berry-Hinkley Terminal, Inc. of Sparks, Nevada;

b. BP Oil Company of Cleveland, Ohio;

c. Chevron U.S.A. Inc. of San Francisco, Ca.;

d. Golden Gate Petroleum Co. of Orinda Ca.;

e. Santa Fe Pacific Pipelines Inc. of Los Angeles, Ca.;

f. Shell Oil Company of Houston, Texas;

g. Southern Pacific Transportation Co. of San Francisco, Ca.;

h. Texaco Refining and Marketing Inc. of Houston, Texas;

i. Time Oil Co. of Seattle Wa.; and

j. Unocal Corporation of Los Angeles, Ca.

D. Incident and Release Characteristics

1. The Site includes soils contaminated with hydrocarbons, chlorinated solvents, fuel additives and asbestos. The groundwater beneath the Site is also contaminated with chlorinated solvents and petroleum.

2. Four chlorinated solvents have been detected in the groundwater. They are tetrachloroethylene (PCE), trichloroethene (TCE), trichorofluormethane (Freon 11) and

methylene chloride. These contaminants were detected in concentrations exceeding the federal drinking water standards or Maximum Contaminant Levels (MCL) established for these substances. Drinking water that meets the MCL is considered to be protective of human health and the environment.

3. The area of contamination extends eastward from the tank farm and rail yard at least one mile where it discharges into a gravel pit owned by the Helms Construction and Development Company. The main sources of the contamination are thought to be the rail yard, tank farm, pipeline facility, and possibly several small fuel storage and delivery facilities adjacent to the tank farm. The full extent of the area of contamination is undetermined.

E. Quantities and Types of Substances Present

1. On July 15-17, 1991, the Environmental Protection Agency's Technical Assistance Team collected environmental samples at the site. Laboratory analysis of the Ground water contamination detected the following four chlorinated solvents:

a. Trichloroethene (TCE) detected in four wells at concentrations between 15 and 240 ug/l;

b. Tetrachloroethylene (PCE) detected in three wells at concentrations between 10 and 14 ug/l;

c. Methylene chloride detected in three wells at concentrations between 27 and 87 ug/l; and

d. Trichorofluoromethane (Freon 11) detected in three wells at concentrations between 14 and 28 ug/l.

2. Quarterly monitoring implemented pursuant to the Removal Action Plan for the Site, detected TCE, PCE, and Freon in

surface water along the seep face at the Helm's Pit.

F. Threats to Public Health and Welfare

1. EPA identified several threats to the public health posed by the presence of tetrachloroethylene, trichloroethene, trichorofluormethane, and methylene chloride contamination at the Site.

2. Tetrachloroethylene (also known as PCE, tetrachloroethene, and perchloroethylene) is a suspected carcinogen. Ingestion of tetrachloroethylene has been determined by the Nation Institute for Occupational Safety and Health (NIOSH) to cause adverse effects and damage to the liver, the kidney, the upper respiratory system, and the central nervous system.

3. Trichloroethene (also known as TCE and trichlorethylene) is a suspected carcinogen. Ingestion of trichloroethene has been determined by NIOSH to cause adverse effects to the heart, the kidneys, the respiratory system, and the central nervous system.

4. Methylene chloride has been determined by NIOSH to cause adverse effects upon ingestion to the central nervous system and the cardiovascular system.

5. Trichorofluormethane (also known as Freon 11) has been determined by NIOSH to cause adverse effects to the heart and lungs.

6. Tetrachloroethylene (PCE) biodegrades, or transforms, into several other hazardous organic constituents. PCE readily degrades into trichloroethene (TCE), a suspected carcinogen and 1,1,1, trichloroethane (TCA), another suspected

carcinogen. TCE and TCA in turn degrade into vinyl chloride, also a suspected carcinogen.

7. The municipal water supply for the City of Sparks is provided by Westpac Utilities which derives 75% of its water from surface sources and 25% from groundwater. To EPA's knowledge, there are no public water systems that have been affected by the contamination, and no one is drinking water contaminated by this Site at this time. A potential threat to public health may exist, however, if contaminated groundwater were to be consumed in the future. If the present source of drinking water cannot sustain demand, pumping of local groundwater for consumption as drinking water may be required. In addition, a potential threat to the Truckee River may exist, possibly impacting the health of anyone drawing water downstream.

G. Threats to the Environment

1. Migration to the Truckee River and Pyramid Lake

The geological make-up of the soil beneath the Site consists of alluvial deposits made up of sand, gravel and cobbles. These alluvial deposits continue for many miles off-site. Volatile contaminants such as PCE, TCE, Freon 11, and methylene chloride (as well as degradation compounds such TCA and vinyl chloride) are readily transported through this type of soil. To enter the Truckee River, contaminants need to travel approximately 0.8 miles. From this point, the Truckee River flows approximately 50 miles to its terminus at Pyramid Lake.

There are two different pathways in which the chlorinated solvents mentioned above may leave the Site and enter the Truckee River System. The first pathway begins in the subsurface soils

beneath the Site and extends directly south through the sand and gravel soils directly into the Truckee River 0.8 miles away. Adding to the highly transmissive qualities of the these alluvial soils are old prehistoric river beds lying beneath the surface which facilitate the migration of contaminants.

The second pathway begins in the subsurface soils beneath the Site and extends east through the sand and gravel soils and into the west wall of the Helms Gravel Pit one mile away. This gravel pit is approximately 100 feet deep and covers over 100 acres. Contaminants originating from the Site reach the pit wall, seep down into the bottom, flow to the pit floor and mix with the existing waters which have accumulated due to the dewatering of the local aquifer. From the Helms Gravel Pit, the water-and-contaminant-mixture is pumped regularly up the 100 vertical wall into the Peoples Ditch. From the ditch, the water-and-contaminant-mixture flows directly south one mile to the Truckee River.

2. Impacting Aquatic Resources

The movement of solvent and fuel contamination from the vicinity of the Southern Pacific Railroad and the Santa Fe Pipeline Partners Fuel Terminal by either of the aforementioned pathways to the Truckee River affects the aquatic life of both the Truckee River and Pyramid Lake. By federal law, the impact of this aquatic resource is the responsibility of United States Department of Interior as the "Natural Resource Trustee."

At the request of the U.S. Environmental Protection Agency, Robert J. Hallock, Acting Field Supervisor of the United States Department of Interior, Fish and Wildlife Service, Fish and

Wildlife Enhancement, Reno Field Station, has submitted the following statement:

> The endangered cui-ui (Chasmistes cujus) are endemic to Pyramid Lake at the terminus of the Truckee River. This fish is an obligate stream spawner and during many years flow in the Truckee River is regulated to optimize spawning habitat during, before, and after the spring spawning runs. Flows in the 1,000 to 2,000 cubic feet per second range are maintained. Thus, the potential for dilution of contaminants is limited during the critical spawning period.
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> The threatened Lahontan cutthroat trout (Oncorhynchus clarki) usually enter the Truckee River in conjunction with the cui-ui runs. These fish may pass upstream as far as Derby Dam. In addition juvenile Lahontan cutthroat trout are stocked in the lower Truckee River for natural rearing during winters when sufficient flow is available.
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> Resident game fish; brown trout (Salmo trutta), rainbow trout (Oncorhynchus gairdneri), and mountain white fish (Prosopium williamsoni), are typically present in the Truckee River in the vicinity of the spill site. Limited brown trout spawning may be expected in this portion of the Truckee River above the confluence of Steamboat Creek.

III. CONCLUSIONS OF LAW

A. Based on the foregoing Findings, U.S. EPA has concluded that:

1. The Southern Pacific Rail Yard; the Santa Fe Pacific Pipeline Limited Partnership Reno Terminal Tank Farm; the past and present fuel delivery and storage operations; and the areas of soil and groundwater contamination are a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9).

2. Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).

3. Respondent is the "operator" of the Site, or a portion thereof, as defined by Section 101(20) of CERCLA, 42 U.S.C. Section 9601(20). Respondent is a liable person under

Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a).

4. Trichloroethene, Tetrachloroethylene, Methylene chloride, and Trichorofluormethane are "hazardous substances" as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14).

5. The presence of hazardous substances on the Site and the potential for those hazardous substances to migrate and adversely impact the regional aquifer and the Truckee River constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22).

IV. DETERMINATIONS

A. Based on the Findings of Fact and Conclusions of Law, the Director, Hazardous Waste Management Division, EPA Region IX, has made the following determinations:

1. The actual or threatened release of hazardous substances from the Facility may present an imminent and substantial endangerment to the public health or welfare or the environment.

2. The actions required by this Order, if properly performed, are consistent with the National Contingency Plan (NCP), 40 CFR Part 300 and CERCLA; and are appropriate to protect the public health or welfare or the environment.

3. The conditions present at the Facility constitute a threat to public health or welfare or the environment based upon consideration of the factors set forth in the NCP at 40 CFR section 300.415(b). These factors include, but are not limited to, the following:

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a. actual or potential exposure to hazardous substances by nearby populations, animals, or food chain:

This factor is present due to the existence of chlorinated solvents which have been detected in the ground water and the possible discharge of such substances to the Truckee River.

b. actual or potential contamination of drinking water supplies or sensitive ecosystems;

This factor is present due to the existence of chlorinated solvents which have been detected in the ground water.

c. other situations or factors which may pose threats to public health or welfare or the environment.

This factor is present due to the existence of actual or potential exposure to hazardous substances by nearby populations, animals, or food chain.

V. ORDER

A. Based upon the foregoing Findings, Conclusions and Determinations, and pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), it is hereby Ordered that the Respondent undertake the following actions under the direction of U.S. EPA's On-Scene Coordinator.

1. Within twenty-one (21) calendar days after the effective date of this Order, the Respondent shall submit to U.S. EPA for approval, a Work Plan for the removal activities ordered as set forth in Paragraph 6 below. This Work Plan shall be compatible to the currently approved Site Work Plan and Removal

Action Plan which was developed by the Respondents listed in EPA Order No. 91-22. and which appears in the Site Administrative Record. If the current Respondent joins the previously identified ten Respondents at this Site, Respondent, in lieu of submitting a Work Plan may submit written guarantees, deemed sufficient by U.S. EPA, indicating that it will participate and cooperate in the activities required by the existing Site Work Plan and Removal Action Plan. If Respondent does not join with the existing ten Respondents at this Site, Respondent's Work Plan shall provide a concise description of the activities to be conducted to comply with the requirements of this Order, and shall include a proposed schedule for implementing and completing the activities. The Work Plan shall be reviewed by U.S. EPA, which may approve, disapprove, require revisions, or modify the Work Plan. The Respondent shall implement the Work Plan as finally approved by U.S. EPA. Once approved, the Work Plan shall be deemed to be incorporated into and made a fully enforceable part of this Order.

2. The Work Plan shall contain a site safety and health plan, a sampling and analysis plan, and a schedule of the work to be performed. The site safety and health plan shall be prepared in accordance with EPA's Standard Operating Safety Guide, dated November, 1984, and updated July, 1988, and with the Occupational Safety and Health Administration (OSHA) regulations applicable to Hazardous Waste Operations and Emergency Response, 29 CFR Part 120. The Work Plan and other submitted documents shall demonstrate that the Respondent can properly conduct the actions required by this Order.

3. The Respondent shall retain a contractor qualified to undertake and complete the requirements of this Order, and shall notify U.S. EPA of the name of such contractor within seven (7) days of the effective date of this Order. U.S. EPA retains the right to disapprove of any, or all, of the contractors and/or subcontractors retained by the Respondent. In the event U.S. EPA disapproves of a selected contractor, Respondent shall retain a different contractor to perform the work, and such selection shall be made within two (2) business days following U.S. EPA's disapproval.

4. Within five (5) calendar days after U.S. EPA approval of the Work Plan, Respondent shall implement the Work Plan as approved or modified by U.S. EPA. Failure of the Respondent to properly implement all aspects of the Work Plan shall be deemed to be a violation of the terms of this Order. The Work Plan shall require the Respondent to perform, and complete within ninety (90) calendar days after approval, at a minimum, the following removal activities:

a. Stop all continuing sources of contamination on the Site;

b. Define and characterize the contamination on Site and off-site;

c. Develop and implement removal actions to eliminate any imminent and substantial threat to the public health and/or the environment.

d. Develop and implement a plan to ensure continued pumping of Helm's Pit until such time sufficient to implement the Removal

Action Plan for the Site.

5. Respondent shall provide U.S. EPA with written weekly summary reports. These reports should contain a summary of the previous week's activities and planned up-coming events.

6. U.S. EPA shall be informed at least forty-eight (48) hours prior to any on-Site work.

7. All sampling and analysis shall be consistent with the "Removal Program Quality Assurance/Quality Control Interim Guidance: Sampling, QA/QC Plan and Data Validation," U.S. EPA OSWER Directive 9360.4-01, dated February 2, 1989.

8. All materials containing hazardous substances, pollutants, or contaminants removed pursuant to this Order shall be disposed of or treated at a facility approved by the On-Scene Coordinator and in accordance with the Resource Conservation and Recovery Act of 1976 (RCRA), 42 U.S.C. Section 9601, et seq., as amended, the U.S. EPA Revised Off-Site Policy, and all other applicable Federal, State, and local requirements.

9. On or before the effective date of this Order, the Respondent shall designate a Project Coordinator. To the greatest extent possible, the Project Coordinator shall be present on site or readily available during site work. The U.S. EPA has designated Donn Zuroski, as its On-Scene Coordinator. The On-Scene Coordinator and the Project Coordinator shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communication between the Respondent and the U.S. EPA, and all documents, reports, and approvals, and all other correspondence concerning the activities relevant to this Order, shall be directed through the On-Scene Coordinator

and the Project Coordinator.

10. The U.S. EPA and the Respondent shall each have the right to change their respective designated On-Scene Coordinator or Project Coordinator. U.S. EPA shall notify the Respondent, and Respondent shall notify U.S. EPA, as early as possible before such a change is made, but in no case less then 24 hours before such a change. Notification may initially be verbal, but shall promptly be reduced to writing.

11. The U.S. EPA On-Scene Coordinator shall have the authority vested in an On-Scene Coordinator by the NCP, 40 CFR Part 300, as amended, including the authority to halt, conduct, or direct any work required by this Order, or to direct any other response action undertaken by U.S. EPA or the Respondent at the Facility.

12. No extensions to the above time frames shall be granted without sufficient cause. All extensions must be requested, in writing, and shall not be deemed accepted unless approved, in writing, by U.S. EPA.

13. All instructions by the U.S. EPA On-Scene Coordinator or his designated alternate shall be binding upon the Respondent as long as those instructions are not clearly inconsistent with the National Contingency Plan.

14. To the extent that the Facility or other areas where work under this Order is to be performed is owned by, or in possession of, someone other than the Respondent, the Respondent shall obtain all necessary access agreements. In the event that after using its best effort the Respondent is unable to obtain such agreements, the Respondent shall immediately notify U.S.

EPA.

15. The Respondent shall provide access to the Facility to U.S. EPA employees, contractors, agents, and consultants at reasonable times, and shall permit such persons to be present and move freely in the area in order to conduct inspections, including taking photographs and videotapes of the Facility, to do cleanup/stabilization work, to take samples to monitor the work under this Order, and to conduct other activities which the U.S. EPA determines to be necessary.

16. Nothing contained herein shall be construed to prevent U.S. EPA from seeking legal or equitable relief to enforce the terms of this Order, or from taking other legal or equitable action as it deems appropriate and necessary, or from requiring the Respondent in the future to perform additional activities pursuant to CERCLA, 42 U.S.C. Section 9601, et seq., or any other applicable law.

17. The provisions of this Order and the directions of the On-Scene Coordinator shall be binding on the employees, agents, successors, and assigns of the Respondent.

18. Except where this Order specifically provides otherwise, its obligations shall be effective three (3) calendar days following issuance unless a conference is requested as provided herein. If a conference is requested, this Order shall be effective on the second (2nd) calendar day following the day of the conference unless modified in writing by U.S. EPA.

19. On or before two (2) calendar days after the effective date of this Order, Respondent shall provide notice, verbally or in writing, to U.S. EPA stating their intention to

comply with the terms of this Order. Verbal notification must be followed in writing within one (1) calendar day. In the event the Respondent fails to provide such notice, the Respondent shall be deemed not to have complied with the terms of this Order.

20. The Respondent shall retain copies of all records and files relating to hazardous substances found on the site for six years following completion of the activities required by this Order and shall make them available to the U.S. EPA prior to the termination of the removal activities under this Order.

21. The Respondent shall submit a final report summarizing the actions taken to comply with this Order. The report shall contain, at a minimum: identification of the facility, a description of the locations and types of hazardous substances encountered at the facility upon the initiation of work performed under this Order, a chronology and description of the actions performed (including both the organization and implementation of response activities), a listing of the resources committed to perform the work under this Order (including financial, personnel, mechanical and technological resources), identification of all items that affected the actions performed under the Order and discussion of how all problems were resolved, a listing of quantities and types of materials removed from the facility, a discussion of removal and disposal options considered for any such materials, a listing of the ultimate destination of those materials, and a presentation of the analytical results of all sampling and analyses performed and accompanying appendices containing all relevant paperwork accrued

during the action (e.g., manifests, invoices, bills, contracts, permits). The final report shall also include an affidavit from a person who supervised or directed the preparation of that report. The affidavit shall certify under penalty of law that based on personal knowledge and appropriate inquiries of all other persons involved in preparation of the report, the information submitted is true, accurate, and complete to the best of the affiant's knowledge and belief. The report shall be submitted within thirty (30) days of completion of the work required by the U.S. EPA.

22. All notices, reports, and requests for extensions submitted under terms of this Order shall be sent by certified mail, return receipt requested, and addressed to the following:

one copy — Donn Zuroski
On Scene Coordinator
U.S. EPA
75 Hawthorne Street
San Francisco, CA 94105

one copy — Mark Klaiman
Assistant Regional Counsel
Office of Regional Counsel
U.S. EPA
75 Hawthorne Street
San Francisco, CA 94105

23. If any provision of this Order is deemed invalid or unenforceable, the balance of this Order shall remain in full force and effect.

VI. ACCESS TO ADMINISTRATIVE RECORD

A. The Administrative Record supporting the selection of the response action for this site is available for review on normal business days between the hours of 9:00 a.m. and 5:00 p.m. in the Office of Regional Counsel, United States Environmental

Protection Agency, Region IX, 75 Hawthorne Street, 16th Floor, San Francisco, California. Please contact Mark Klaiman, Assistant Regional Counsel, at (415) 744-1374 to review the Administrative Record. An index of the Administrative Record is attached hereto.

B. The Administrative Record is also available for review at the Washoe County Sparks Branch Library in Sparks, Nevada and the Washoe County Main Library in Reno, Nevada.

VII. OPPORTUNITY TO CONFER

A. With respect to the actions required above, The Respondent may within three (3) calendar days after issuance of this Order, request a conference with the U.S. EPA. Any such conference shall be held within three (3) calendar days from the date of request unless extended by mutual agreement of the parties. At any conference held pursuant to the request, the Respondent may appear in person, or be represented by an attorney or other representative. If the Respondent desires such a conference, the Respondent shall contact Mark Klaiman, Assistant Regional Counsel, at (415) 744-1374.

B. If such a conference is held, the Respondent may present any evidence, arguments or comment regarding this Order, its applicability, any factual determinations upon which the Order is based, the appropriateness of any action which the Respondent is ordered to take, or any other relevant and material issue. Any such evidence, arguments or comments should be reduced to writing and submitted to U.S. EPA within three (3) calendar days following the conference. If no conference is requested, any such evidence, arguments or comments must be

submitted in writing within three (3) calendar days following the Effective Date of this Order. Any such writing should be directed to Mark Klaiman, Assistant Regional Counsel, at the address cited above.

C. The Respondent is hereby placed on notice that U.S. EPA will take any action which may be necessary in the opinion of U.S. EPA for the protection of public health and welfare and the environment, and the Respondent may be liable under Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a), for the costs of those government actions.

VIII. PENALTIES FOR NONCOMPLIANCE

A. The Respondent is advised pursuant to Section 106(b) of CERCLA, 42 U.S.C. Section 9606(b), that willful violation or subsequent failure or refusal to comply with this Order, or any portion thereof, may subject the Respondent to a civil penalty of up to $25,000 per day for each day in which such violation occurs, or such failure to comply continues. Failure to comply with this Order, or any portion thereof, without sufficient cause may also subject the Respondent to liability for punitive damages in an amount three times the amount of any cost incurred by the government as a result of the failure of Respondent to take proper action, pursuant to Section 107(c)(3) of CERCLA, 42 U.S.C. Section 9607(c)(3).

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THIS ORDER IS ISSUED on this 14th day of June, 1993.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

By: _____
Jeff Zelikson, Director
Hazardous Waste Management Division
United States Environmental
Protection Agency Region IX

for

SPARKS SOLVENT/FUEL SITE ADMINISTRATIVE RECORD INDEX

- Southern Pacific Transportation Company Sparks Railroad Yard Investigation Proposed Sale Property Sparks, Nevada May 1990

  prepared by CH2M HILL May 11, 1990

- Evaluation of existing data for the Sparks solvent/fuel plume

  prepared by Ecology and Environment DRAFT June 3, 1991

- Preliminary Data from Removal Assessment July 15-17, 1991

  prepared by Ecology and Environment August 16, 1991

- Santa Fe Pacific Tank Farm SPCC Inspection Report

  prepared by Ecology and Environment April 22, 1991

- Letter from U.S. Fish and Wildlife Service to Donn Zuroski from Robert. J. Hollock August 8, 1991

Guidance Documents

- Emergency Response Procedures for Control of Hazardous Sub stance Releases

  prepared by Melvold, R.W./Rockwell International January 1, 1983

- Superfund Removal Procedures Revision #3

  prepared by OSWER/OERR February 1, 1988

- National Oil & Hazardous Substances Pollution Contingency Guidance, Part 300, 40 CFR Ch.1

  March 8, 1990